## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

WESTERN KENTUCKY GAS COMPANY )
REQUEST FOR DEVIATION OF )
807 KAR 5:022, SECTION 13(17) ) CASE NO. 9057
(F)(3) AND (4), ODORIZATION )
SAMPLING OF NATURAL GAS

## ORDER

On April 1, 1984, new gas safety and service regulations went into effect. The new regulations, 807 KAR 5:022, consolidated Kentucky state regulations and federal regulations (Title 49, Parts 191 and 192) into a single regulation. This action repealed the existing state regulation 807 KAR 5:021.

Western Kentucky Gas Company ("Western") has requested that it be granted a deviation from 807 KAR 5:022, Section 13(17)(F)(3) and (4), pertaining to odorization of gas. The new regulations state that separately odorized systems with more than 10 customers shall be sampled for proper odorant level at least once each week. Separately odorized systems with 10 or fewer customers shall be sampled for proper odorant level at least once each 95 days.

Western serves natural gas to three major towns: Owensboro, Paducah and Bowling Green. The remainder of Western's customers are spread over 105 rural communities, with an average of less than 800 customers each.

Western proposes that:

- (1) Separately odorized systems with more than 2,000 customers shall be sampled for proper odorant level at least once each week;
- (2) Separately odorized systems with from 11 to 2,000 customers shall be sampled for proper odorant level at least once each month; and
- (3) Separately odorized systems with 10 or fewer customers shall be sampled for proper odorant level at least once each 95 days.

Due to the territorial make-up of Western's distribution system, the existing regulation concerning odorization sampling would put an undue financial burden on Western that would ultimately be passed on to the ratepayer. Western's requested deviation would not compromise safety to the ratepayer.

Western's Operating and Maintenance Plan requires that each time a serviceman enters a dwelling to work a service order, he must perform a "sniff test" and record the results on the service order. This procedure will continue in addition to the proposed odorization sampling schedule.

Western contends that the adding of odorant to natural gas is not a high technology procedure. The odorant is quite inexpensive and is normally injected at two to three times the

recommended rate in order to insure adequate odorization. Most of the odorant injection equipment is of the by-pass type that has no moving parts and requires only seasonal adjustments in the spring and fall. Under these procedures approximately 75 percent of Western's customers will be sampled weekly.

IT IS THEREFORE ORDERED that Western Kentucky Gas Company be granted a deviation from 807 KAR 5:022, Section 13(17)(F)(3) and (4), to provide that:

- (1) Separately odorized systems with more than 2,000 customers shall be sampled for proper odorant level at least once each week;
- (2) Separately odorized systems with from 11 to 2,000 customers shall be sampled for proper odorant level at least once each month; and
- (3) Separately odorized systems with 10 or fewer customers shall be sampled for proper odorant level at least once each 95 days.

IT IS FURTHER ORDERED that Western shall provide supporting data after the first 12 months to assure the Commission that the same level of protection is afforded its customers as specified in 807 KAR 5:022, Section 13(17)(F)(3) and (4), of the gas safety and service regulations.

Done at Frankfort, Kentucky this 26th day of June, 1984.

PUBLIC SERVICE COMMISSION

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ATTEST:

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